

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FREE SPEECH COALITION, INC., et al.)	CASE NO. 2:09-4607
)	
Plaintiffs,)	JUDGE MICHAEL M. BAYLSON
)	
-vs-)	
)	<u>PLAINTIFFS' UNOPPOSED MOTION</u>
THE HONORABLE JEFF SESSIONS,)	<u>FOR EXTENSION OF TIME TO FILE A</u>
Attorney General,)	<u>REPLY TO DEFENDANT'S BRIEF IN</u>
)	<u>SUPPORT OF ITS MOTION FOR ENTRY</u>
Defendant.)	<u>OF JUDGMENT, TO AND INCLUDING</u>
		<u>JUNE 9, 2017</u>

On January 25, 2017, this Court set a briefing schedule with respect to the parties' cross-motions for entry of judgment in their favor. In accordance with that schedule, Plaintiffs filed the brief in support of their motion on February 24, 2017. Defendant then sought and received an extension of six weeks to file its brief. Defendant filed its brief in support of its motion on May 12, 2017. Plaintiff's reply is currently due on June 2, 2017. Plaintiffs seek a brief extension of seven days to and including June 9, 2017 to file their reply.

Plaintiffs' counsel has been diligently working on the reply, but requires additional time to efficiently respond to the Government's arguments. The press of other matters, including preparation of other briefs, out-of-town depositions, mediation, and a detention hearing has also contributed to the need for a brief extension.

Defendant's counsel consents to this extension.

This motion is made in good faith and not for purposes of delay.

Plaintiffs, therefore, respectfully request that this Court grant Plaintiffs an extension of seven days, to and including June 9, 2017, to file their reply brief.

Respectfully submitted,

Date: May 30, 2017

/s/ J. Michael Murray
J. MICHAEL MURRAY (0019626)
jmmurray@bgmdlaw.com
LORRAINE R. BAUMGARDNER (0019642)
lbaumgardner@bgmdlaw.com
BERKMAN, GORDON, MURRAY & DeVAN
55 Public Square, Suite 2200
Cleveland, Ohio 44113-1949
(216) 781-5245 / (216) 781-8207 (Facsimile)

KEVIN E. RAPHAEL (72673)
KER@Pietragallo.com
J. PETER SHINDEL, JR. (201554)
JPS@Pietragallo.com
PIETRAGALLO GORDON ALFANO BOSICK
& RASPANTI, LLP
1818 Market Street, Suite 3402
Philadelphia, Pennsylvania 19103
(215) 320-6200 / (215) 981-0082 (Facsimile)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2017, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ J. Michael Murray

J. MICHAEL MURRAY (0019626)

LORRAINE R. BAUMGARDNER (0019642)

BERKMAN, GORDON, MURRAY & DeVAN

KEVIN E. RAPHAEL (72673)

J. PETER SHINDEL, JR. (201554)

PIETRAGALLO GORDON ALFANO BOSICK
& RASPANTI, LLP

Attorneys for Plaintiffs